

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
12 JUN 25 AM 9:59

NORTHERN DISTRICT OF OHIO
CLEVELAND

HODELL-NATCO INDUSTRIES, INC.) CASE NO. 1:08 CV 2755
)
Plaintiff,) JUDGE WELLS
)
v.) MOTION OF DEFENDANTS, SAP
) AMERICA, INC. AND SAP AG, INC.
SAP AMERICA, INC., et al.) FOR APPEARANCE BY COUNSEL
) PRO HAC VICE
Defendants.)
)

Defendants, SAP America, Inc. and SAP AG (collectively, "SAP"), by and through their undersigned counsel, respectfully move this Court, pursuant to Local Rule 83.5(h), for an Order permitting Joseph M. Kelleher to appear in the above captioned matter as counsel for SAP.

In support of this Motion, counsel for SAP state as follows:

1. SAP is presently represented by Hugh E. McKay, Leo M. Spellacy, Jr. and Charles W. Zepp of the law firm of Porter Wright Morris & Arthur LLP. Messrs. McKay, Spellacy and Zepp are members of the bar of the State of Ohio, and are members of the bar of this Court, and maintain an office for the practice of law in Cleveland, Ohio.

2. Petitioner Joseph M. Kelleher has been and is currently a member in good standing of the Bar of the Commonwealth of Pennsylvania (2009), the State of New Jersey (2010), and the United States District Court for the Eastern District of Pennsylvania (2011).

3. Mr. Kelleher is an associate at Drinker Biddle & Reath LLP, located at One Logan Square, Suite 2000, Philadelphia, PA, 19103. Mr. Kelleher's telephone number is (215) 988-2863 and facsimile number is (215) 988-2757. Mr. Kelleher's email address is

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joseph.kelleher@dbr.com, his Pennsylvania bar registration number is 307556, and his New Jersey bar registration number is 040602009.

4. Attached to and in support of this Motion, pursuant to Local Rule 83.5(h), is a Certificate of Good Standing dated June 13, 2012 indicating that Mr. Kelleher is an active member in good standing of the Bar of the Supreme Court of Pennsylvania and a Certificate of Good Standing dated June 15, 2012 indicating that Mr. Kelleher is an active member in good standing of the Bar of the Supreme Court of New Jersey.

Upon his admission *pro hac vice*, Mr. Kelleher will be associated with the undersigned members of the Bar of this Court.

Dated: June 21, 2012

Respectfully submitted,

/s/ Charles W. Zepp

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*Attorneys for Defendants, SAP America, Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2012, I caused a copy of the foregoing Motion of Defendants for Appearance by Counsel *Pro Hac Vice* be served on the following by first-class U.S. mail, postage prepaid, at the following addresses:

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